

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION**

Nancy Blanchard,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 9:20-cv-02612-RMG
)	
PETCO Animal Supplies Stores, Inc.,)	
)	
Defendant.)	
_____)	

**JOINT STIPULATION OF DISMISSAL OF CLAIMS
AND CONSENT TO ARBITRATION**

COMES NOW Plaintiff Nancy Blanchard (“Plaintiff”) and Defendant Petco Animal Supplies Stores, Inc. (“Petco” or “Defendant”) (collectively referred to as “Parties”), by and through their respective undersigned attorneys of record, and stipulate as follows:

1. The Parties entered into a Mutual Arbitration Agreement in August of 2019 while Plaintiff was an employee of Petco Animal Supplies Stores.
2. The Parties stipulate that the claims asserted by Plaintiff in her Amended Complaint (ECF No. 5) fall within the purview of the Parties’ Arbitration Agreement, which provides that “all ... federal, state, or local legal claims arising out of or relating to [Plaintiff’s] application for employment, employment, or termination of employment” are covered under the Arbitration Agreement and are subject to arbitration.
3. Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, Plaintiff hereby voluntarily dismisses all claims asserted or that could have been asserted in this Court against Defendant and consents to adjudication of her claims as alleged in her Amended Complaint by way of arbitration.

4. Defendant, by and through their undersigned attorney of record hereby consents to Plaintiff's voluntary dismissal of all claims asserted or that could have been asserted herein against them and additionally consents to the adjudication of Plaintiff's claims through arbitration.

WHEREFORE, the Parties jointly stipulate that all proceedings in this case be dismissed before this Court and that Plaintiff pursue arbitration of her claims.

FOR PLAINTIFF:

s/ Emily Hanewicz Tong
Emily Hanewicz Tong (Fed. Bar No. 12177)

WIGGER LAW FIRM, INC.
8086 Rivers Avenue, Suite A
North Charleston, South Carolina 29406
Telephone: (843) 553-9800
Email: EHTong@wiggerlawfirm.com

FOR DEFENDANT:

s/ Cashida N. Okeke
Cashida N. Okeke (Fed. Bar No. 12026)
D. Randle Moody, II (Fed. Bar No. 7169)

JACKSON LEWIS P.C.
15 South Main St., Suite 700
Greenville, South Carolina 29601
Telephone: (864) 232-7000
Email: Cashida.Okeke@jacksonlewis.com
Randy.Moody@jacksonlewis.com